

*1998 STATE FISCAL YEAR*

PERFORMANCE  
PARTNERSHIP  
AGREEMENT

*Between*

**OREGON  
DEPARTMENT OF ENVIRONMENTAL QUALITY**

**&**

**UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY  
REGION 10**

**APPENDIX C - HAZARDOUS WASTE  
PARTNERSHIP PLAN**

**HAZARDOUS WASTE PARTNERSHIP PLAN**

## **1.0 INTRODUCTION**

This year's hazardous waste PPA has three goals:

- 1) to provide a status report on the hazardous waste strategic planning effort and describe how the planning framework will guide future program actions;
- 2) to reflect the Core RCRA Program efforts to be accomplished by Oregon with the Federal funds provided through the RCRA grant; and
- 3) to represent the areas of federal commitments to Core RCRA and Oregon priority activities.

About 20 percent of the Hazardous Waste Program's resources are provided through the federal grant to provide support for activities of the authorized RCRA program. The remaining 80 percent of the program's resources come from state sources or project-specific federal funds. These resources are committed, in part, to supplement the federal funding of the Core RCRA activities, but are also dedicated to activities that reflect the State's priorities in hazardous waste management, such as technical assistance and toxics use reduction. This year's PPA will provide information equivalent to the former State/EPA Agreement on the Core RCRA program activities (e.g., permitting, inspections, enforcement) but will place those efforts into the broader strategic planning effort being developed by the hazardous waste program.

Section 2.0 provides a discussion of the strategic planning effort, which is the basis for this PPA, and how the core RCRA program activities and the PPA process relate to the strategic planning efforts. A description of core program activities is included in Section 3.0. The information in the attached tables provides a status report of the planning effort. Input from various sources has been included to develop possible program implementation strategies as well as options for performance measures. Since the program is in the middle of strategic planning, strategies and performance measures outlined in the tables are still options to be evaluated. The next PPA will reflect the results of evaluating program implementation strategies and performance measures.

## **2.0 STRATEGIC PLANNING PROCESS AND FRAMEWORK**

### **2.1 Process**

Environmental programs nationwide have matured to the point that often the purpose behind the regulatory structure seems distant from the environmental reason the program was created in the first place. Both government and industry have evolved from the old command and control structure to working together in partnerships that foster pollution prevention, sound environmental management and more mutually satisfying outcomes.

In response to these influences the hazardous waste program began a strategic planning process in mid-1996. The program sought to gather input and ideas from many sources. As a result, the hazardous waste program managers organized two main sources: (1) an internal plan development

team with staff level representation from all three regions and headquarters, and (2) an external hazardous waste program advisory committee with 20 members representing Oregon's major industry sectors, small business, local governments and public interest. The internal planning development team was designed to complete the ground level input to the plan and will be the focal point for completing the staff work on plan development. The external committee's role has been to evaluate the program's current activities, and consider potential future activities, as well as to provide perspective on the major environmental issues that impact the Agency's ability to achieve program goals and to recommend strategies for addressing these issues.

The strategic planning process will continue after this year's agreement is completed and signed. Future PPAs will reflect the program's strategic plan, which will be a dynamic and evolving document. EPA is committed to joining the hazardous waste program in its strategic planning effort. Additionally, future PPAs will reflect the strategic planning efforts of EPA and how the two strategic plans interrelate.

The hazardous waste program is currently in a position of evaluating its funding sources and priorities based on potential budget shortfalls. Management is committed to the strategic planning process, but is also aware that decisions about the direction of the program may be heavily influenced by budget considerations. This makes the need for development of a program purpose and goals critical to ensuring that limited resources are committed to priority efforts and environmental results. It also highlights the necessity for EPA and DEQ to work together in strategic planning so resources can be targeted in the most effective manner to reach common environmental goals.

## 2.2 Program Purpose and Goals

Hazardous waste program managers evaluated the environmental purpose behind the hazardous waste program and set forth a purpose statement and four environmentally based program goals.

|  |  |
|--|--|
| Environmental Purpose<br>Hazardous Waste Program | To minimize the risk to human health and the environment from toxic chemicals and hazardous waste.                     |
| Goal No 1 - Minimization                         | To reduce the use of toxic chemicals and minimize the generation of hazardous waste.                                   |
| Goal No 2 - Safe Management                      | To minimize exposures and releases through appropriate management of toxic chemicals and hazardous wastes.             |
| Goal No 3 - Remediation                          | To remediate non-authorized releases of toxic chemicals and hazardous waste to the environment.                        |
| Goal No 4 - Communication                        | To maximize the public's involvement in the achievement of the goals of minimization, safe management and remediation. |

A planning framework was developed, providing a structure for both the long-term program plan and

the PPA.

Following the framework:

- \* First, areas of environmental concern or issues surrounding the achievement of each goal are identified. These issues prevent the program from reaching the goal.
- \* Then, sources of these concerns or issues are identified. These sources could be chemical, industry, geographic or regulatory based.
- \* Once issues and sources are identified, objectives are developed that are linked to a specific goal. These objectives should be measurable and achievable.
- \* The next step is to identify program implementation strategies and activities that will achieve the objectives.
- \* Finally, measurement and evaluation tools are developed and implemented. It is anticipated that evaluation will be ongoing to determine if issues or objectives need to be redefined, or strategies modified to meet the objectives and goals. Performance measures are currently based on outputs, such as number of inspections. The planning process will evaluate possible environmental indicators as potentially better performance measures to provide feedback on how the hazardous waste program's activities are affecting the environment.

### **2.3 Barriers and Strategies**

The program's planning activity has been focused on the issues and barriers that prevent the program from achieving the four goals. The planning steps of issue and area of concern identification evolved into the discussion of barriers to success and possible implementation strategies.

The following table provides a summary of issues or barriers that have been identified as impediments to reaching the four program goals. Program implementation strategies have been developed that will be evaluated as possible ways to address these issues and barriers. These state-wide priorities provide context to the selection of activities to implement the program objectives.

| BARRIERS TO ACHIEVING HAZARDOUS WASTE PROGRAM GOALS  | PROGRAM IMPLEMENTATION STRATEGIES TO OVERCOMING BARRIERS   |
|--|--|
| Generators do not connect the effects of hazardous waste management on other media, creating a disincentive to achieving toxics and waste reduction, as well as safe management.   | Work with EPA and other media programs to establish greater communication and education.   |
| Inadequate DEQ contact with the regulated community and regulated community trust concerns are impediments to minimization and safe management.  | Increase DEQ presence through education and outreach that build trust, decrease in toxics use and waste generation, and increases safe management.   |
| DEQ provides confusing risk communication and sends mixed messages.  | DEQ should communicate clear program priorities with a strong focus on minimization, focusing on reducing toxics that present increased risks. Improve public understanding and balance of environmental impacts.                                    |
| Small companies do not receive the same attention from DEQ or have the same resources for minimization as large companies.   | Provide technical assistance to small companies to promote toxics reduction.   |
| Current enforcement policies do not provide an incentive to reduce toxics or waste, or to comply with RCRA. Improper management does not incur a cost until violations are discovered. Some businesses are not willing to cooperate. | Ensure that DEQ's enforcement policy creates incentives to reduce toxics and waste, or to comply with RCRA. The policy should ensure that there are economic consequences for noncompliance, and economic incentives to reduce and comply with RCRA. |
| Lack of knowledge about the regulations leads to noncompliance with RCRA.  | DEQ must provide guidance which is easy to understand and to implement, and a program that the regulated community trusts and uses.  |
| Unclear regulatory definitions, regulatory loopholes, regulatory disincentives and inflexibility at state and regional EPA level prevent toxics and waste minimization and makes compliance with the rules difficult.                | Create processes or mechanisms at DEQ to provide definitive interpretations of gray areas that prevent reduction and compliance with RCRA.   |
| Inadequate funding, as well as inefficient use of current resources, is a barrier to obtaining compliance with RCRA.   | Use existing inspector and technical assistance staff more efficiently. Improve coordination with other media programs and other agencies.   |
| Some rules allow mismanagement of recyclables and hazardous waste, and prevent safe management practices beyond RCRA.  | Identify rules that allow mismanagement of recyclables. Create interpretations that promote safe management beyond RCRA.   |
| Trying to meet all the rules is a disincentive to reduction and good waste management. Other media programs may be inconsistent with RCRA.   | Through cross media and agency coordination and communication, encourage safe management beyond RCRA.  |
| Cleanups of releases at hazardous waste generator sites under the RCRA corrective action program is not efficient and creates state-wide inconsistencies.  | Work with DEQ's Cleanup Program and EPA Region 10 to address cleanup sites.  |

## 2.4 Priorities and Objectives

Objective development occurred in parallel to the identification of barriers.

The following objectives were developed and, if achieved, would help the program meet its goals of minimization and safe management.

| <b>PROGRAM GOALS</b> | <b>OBJECTIVES</b>  |
|----------------------|--|
| 1. Minimization      | 1. Decrease the use of toxics<br>2. Decrease waste generation                          |
| 2. Safe Management   | 1. Increase compliance with RCRA<br>2. Increase safe management beyond RCRA compliance |

A fifth objective -- to continuously review and improve the hazardous waste program -- was also developed. All five objectives are represented in the attached tables. However, the fifth objective of continuous improvement has been highlighted as a strategy relating to the ongoing strategic planning effort. Objectives have not yet been developed for Goal 3: Remediation and Goal 4: Communication.

After these objectives were developed, the program implementation strategies described in Section 2.3 were developed. Categories of activities, designed to achieve the implementation strategies or to overcome the barriers the program faces in reaching the four goals, were identified. The following table represents the general categories of activities identified as important to the program in addressing issues and meeting the goals.

| <b>PROGRAM ACTIVITY CATEGORIES</b>  |  |
|---|--|
| Authorization<br>Chemical and Process Modification<br>Close Regulatory Loopholes and Policy<br>Clarification<br>Communication<br>Compliance and Enforcement Systems<br>Corrective Action/Cleanup<br>Cross Media, Program and Agency<br>Coordination<br>Education/Outreach<br>Improved Revenue Systems<br>Monetary Incentives and Disincentives<br>Penalty Systems | Permitting<br>Priority/Worst First/Environmental Impact<br>Program Administration/Management<br>Regulatory Flexibility<br>Resource Distribution<br>Rulemaking<br>Small Companies<br>Strategic Planning/Program Development<br>Technical Assistance<br>Training<br>TUR Law Administration<br>Waste Minimization |

The activities in the attached tables are grouped in these categories. The categories are also representative of the types of strategies and activities that will be considered as the strategic plan evolves.

The Hazardous Waste Program held a meeting of all the headquarters and regional staff to gather input into the identification of specific activities the program could implement to meet the goals. To focus the brainstorming, staff were asked to consider four of the Agency-wide strategic planning values:

- |                         |                |
|-------------------------|----------------|
| * Environmental Results | * Transparency |
| * Trust                 | * Efficiency   |

The work the program performs must reflect these values. The program must achieve improved environmental conditions, and work to gain, improve and maintain the trust of both the regulated community and the general public. To be transparent, program actions and communications must be fair, consistent, and above reproach. The program should make the most efficient use of existing resources to achieve the program goals.

## **2.5 Program Measures and Environmental Indicators**

It is the ultimate goal of the strategic planning process to evaluate and select the best methods of measuring program success. To the extent that these measures can be based on the evaluation of actual environmental impact through true environmental indicators, so much the better. Historical methods of measuring program performance have not been based on measuring improvement in environmental conditions, but on specific activities or outputs.

As a transition agreement, this year's PPA will still use output type measures, such as the number of inspections, to indicate program performance and federal grant accountability. However, the PPA approach provides a mechanism to move away from old program "bean count" measures, and focus more on the environmental effects, or environmental indicators of program activities. Therefore, it is anticipated that as the program's planning process continues, and program goals and objectives are more fully used to direct program activities, future PPAs will utilize more environmental indicators as performance measures. The following tables provide some examples of measures that may be evaluated in the on-going strategic planning effort. Some of these are national measures, and are still being broadly discussed between states and EPA. DEQ and EPA Region 10 will look at addressing these national measures in the next hazardous waste PPA.

## **3.0 PPA STRUCTURE AND CONTENT**

The strategic planning effort is mid-stream, but, to the extent possible, the status of progress is reflected in the attached tables. The focus of the strategic planning process to date has been mostly on how to change the manner in which the hazardous waste program currently provides service to the regulated community and on innovative ideas for future consideration, but very little on the nuts and bolts of the everyday program activities.

In discussions between DEQ and EPA about how to make the transition from an SEA to a PPA when the base program strategic planning is not completed, it was decided to highlight the core program activities that have been traditionally addressed in the SEA. Consequently, the agreement tables divide activities into Core RCRA Program and State Only activities (i.e., those not "required" to be implemented under the federally mandated/authorized RCRA program). This section describes how the Core efforts will be reflected in this agreement and other PPA process issues.

### **3.1 Core Program Description**

The authorized RCRA program needs to address the following base activities: inspections, enforcement, permitting, corrective action, authorization, data management, and general federal/state program coordination. These activities will be considered core for the purpose of this agreement. Discussions between EPA and Oregon have focused on (1) the level of commitment Oregon will make to these Core activities utilizing federal grant money; (2) where possible, to identify the level of additional state focus or resources that will be committed to these activities; (3) the level of federal commitment to these activities in support of Oregon's program; and (4) how state and federal priorities will impact the implementation of these Core activities.

DEQ and EPA agree that ensuring compliance with environmental requirements is an essential element of an effective and comprehensive hazardous waste management program. DEQ realizes that enforcement capabilities are one of the many ways to achieve compliance and environmental protection. Appropriate and timely action will be taken when violations are discovered. Technical assistance efforts that foster flexibility, pollution prevention and a "beyond compliance" ethic are also important elements of DEQ's program and philosophy.

Oregon has an authorized hazardous waste program, however both DEQ and EPA have important roles in ensuring compliance and promoting reduction of toxics and waste. The goal is to maximize the appropriate use of the combined agency resources to meet the objectives and priorities outlined in this agreement. DEQ and EPA recognize that DEQ has the primary role in administering the federal hazardous waste program for which the state has been authorized. This agreement reflects the activities the Department will conduct in implementing the delegated RCRA program. The agreement also sets forth state-only activities that do not represent commitments to EPA, but reflect the balance of the activities DEQ conducts in implementing the Oregon Hazardous Waste Program.

The EPA works in partnership with a number of other federal, state, local and tribal organizations in order to accomplish its specific responsibilities under federal environmental laws and to work creatively toward effective, efficient environmental protection. EPA's role with state and tribal agencies is changing from oversight and direction to sharing responsibilities in order to meet mutual goals. As changes occur, however, EPA Region 10 will continue to have a lead or key role in the following activities:

- \* Implementation of HSWA regulations not yet adopted by DEQ and authorized by EPA.
- \* Enforcement actions, particularly when violations have interstate or region-wide impacts.
- \* Ensuring regional and national consistency with regard to regulatory interpretation, compliance assurance, enforcement, and cleanup mechanisms and standards. This could include program review, oversight inspections, and/or issue-specific consultations with the DEQ hazardous waste program.

EPA Region 10 also serves as the primary point of contact and coordination between DEQ and the nine federally recognized tribes within the state of Oregon, and carries out non-delegated tribal programs on Indian reservations. EPA is committed to maintaining the government-to-government relationship with Oregon Tribes in achieving effective and efficient hazardous waste management.

### **3.2 DEQ Core Program Activities**

In keeping with agreements in place between agencies, DEQ and EPA commit to the following core program activities for FY 97-98.

- \* Program Development and Management
  - \* Submittal of three authorization packages:
    - \* Minor federal changes - streamlined package.
    - \* Universal Waste Rule.
    - \* New federal regulations through July 1997.
  - \* Schedule and participate in periodic RCRA coordination meetings with Region 10.
- \* Information Management
  - \* Agree to collect core data elements and perform QA/QC checks in the following program areas:
    - \* Notification of Part A's
    - \* Compliance Monitoring and Enforcement
    - \* Permitting
    - \* Corrective Action
  - \* Perform ongoing data entry for all collected data
    - \* Assign DEQ Identification Numbers to new generators and update RCRIS
    - \* Update RCRIS with Generator Identification number changes
  - \* Gather data from cleanup program on corrective action transition sites
  - \* Perform ongoing data base administrator functions to maintain RCRIS. Update the shared data base through the monthly RCRIS data merge.
  - \* Resolve discrepancies in RCRIS
  - \* Update MOU as needed
  - \* Submit Biennial report data through HWIMSy
- \* Permitting
  - \* Continue permitting activity at TSDs where needed, including permit renewals and modifications
- \* Corrective Action/Cleanup Work
  - \* Work with EPA to develop a transition operating strategy for successful transfer of corrective action sites to DEQ's cleanup program; including identifying which sites will transfer, evaluating the legal issues, assessing the success of transfer and other aspects of implementation.
- \* Compliance Assurance
  - \* Compliance assurance inspections will occur at targeted TSDFs, LQGs, and SQGs.
  - \* Complaint and Non-notifier investigations will also be used to assure compliance.
  - \* Address the federal EPA Office of Enforcement and Compliance Assurance (OECA) priorities as described below.
- \* Enforcement Actions when necessary and appropriate

The OECA FY 98-99 National Enforcement and Compliance Assurance Priorities in the areas of community based, national priority sectors and significant sectors, have been evaluated and will be addressed in the manner described below.

### **Community-Based Priorities**

Participating in programs that provide community based solutions is an integral part of the Oregon's technical assistance program. Examples of these programs include the Governor's Community Solutions Team (CST) and the DEQ-City of Portland Environmental Assistance Project.

- \* The CST identifies areas around the state facing particular challenges and directs the resources of multiple state agencies to address those challenges. Last year, DEQ provided technical assistance to businesses and the community in an economically distressed urban area located in Portland. An ongoing project involves a technical assistance blitz for businesses in another economically challenged section of the city. It is intended that work in 1997-99 will include follow-up to these projects, as well as efforts in additional targeted areas.
- \* The DEQ-City of Portland Environmental Assistance Project was established to provide pollution prevention information to local businesses using staff from both agencies. By combining the expertise of both agencies, comprehensive multi-media pollution prevention assessments can be conducted at eligible facilities. The project is considering regionally-based efforts that concentrate on businesses located near the Columbia and Willamette Rivers.

### **National Priority Sectors**

- \* Primary Non-Ferrous Metal -- The primary nonferrous metals sector will be addressed by Oregon through inspection and technical assistance efforts.
- \* Petroleum Refineries -- There are no petroleum refining facilities located in Oregon.
- \* Dry Cleaners -- Oregon has already made dry cleaners a focus through its state program that provides resources to address dry cleaners with waste management requirements, to identify pollution prevention activities, and to facilitate cleanup.

### **Significant Sectors**

- \* Many of OECA's significant sectors are routinely addressed in the state either through compliance inspections, complaints or technical assistance. Generators always have been and will remain a high priority for the state. A particular area of generator focus this year will be those businesses that are borderline CEG/SQG. Transportation related facilities will be addressed, as will generators who are also state operated or owned facilities.

## **3.3 EPA Core Program Activities**

EPA partnership efforts will include:

- \* Conducting up to three multi-media inspections;
- \* Prioritizing inspections and reviews of RCRA facilities that import or export RCRA hazardous waste;
- \* Assisting DEQ in completing all statutorily mandated inspections which are deemed necessary;

- \* Assisting DEQ with regulatory, legal and programmatic issues related to transition of RCRA corrective action sites to DEQ's cleanup program; and
- \* Assisting DEQ with permitting and cleanup.

EPA is also responsible for implementing the Waste Minimization National Plan. This plan, released in 1994, focuses on reducing the generation and release to the environment of the most persistent, bioaccumulative, and toxic constituents in hazardous wastes. In addition EPA will assist with program training whenever possible.

EPA is committed to participating as a partner in the Oregon Program's strategic planning effort, including the evaluation of opportunities for regulatory flexibility and determining alternate means of achieving program success.

### 3.4 Resources

DEQ has a resource commitment of 55 FTE for implementing the RCRA program. Approximately 13 of those 55 are funded by the EPA grant. EPA Region 10 has 3.6 FTE in its "Oregon Team" dedicated to the RCRA program in Oregon. In total, a combined 59 FTE implement Oregon's hazardous waste program. The following table outlines how DEQ and EPA resources are divided across major portions of the program.

| Resources (% of FTE) Dedicated to Hazardous Waste Program Activities |   |  |   |   |  |
|--|---|--|---|---|--|
| Program Activity   | A<br>% of 42<br>State FTE<br>Funded by<br>State<br>Resources<br>(%) | B<br>% of 13<br>State FTE<br>Funded By<br>EPA Grant<br>(%) | C<br>% of 55<br>Total State<br>FTE<br>(%) | D<br>% of 3.6<br>EPA Oregon<br>Team FTE<br>Expended in<br>Oregon<br>(%) | E<br>% Of<br>Combined<br>59 State<br>and EPA<br>FTE<br>(%) |
| Program Development  | 7   | 1  | 8   | 25  | 9  |
| Information Management   | 4   | 4  | 8   | 8   | 8  |
| Permitting/Closure/Corrective Action **                              | 14  | 8  | 22  | 47  | 24   |
| Compliance   | 24  | 5  | 29  | 12  | 28   |
| Enforcement/Attorney General Support                                 | 4   | 5  | 9   | 5   | 9  |
| Waste Reduction Assistance Program (WRAP)/Waste Min                  | 24  | 0  | 24  | 3   | 22   |
| Total  | 77  | 23   | 100                                       | 100   | 100  |

\* \*\*Includes Department of Defense (DOD) and EPA resources dedicated to the Umatilla Chemical Depot.

The State program is funded one of two major ways - by various state resources such as generator fees, and by the main federal resource, the EPA grant. The table provides a rough indicator of the percent of state resources and EPA Region 10 Oregon Team resources dedicated to certain program activities. Column A details the percentage of state resources that are paid by state funds. Column B provides the breakdown of state resources, funded by the EPA grant. Column C give a summary of total state resources divided by program activity. For example, 22 percent of total state resources are dedicated to permitting, closure and corrective action activities. Percentages of the EPA Region 10 Oregon Team dedicated to Oregon's hazardous waste program are listed in Column D. Column E outlines how the combined resources of EPA and DEQ are split among major program activities.

This information, broken down into more detail, is also used in the attached PPA tables. For example, the program activity of Program Development includes rulemaking, authorization and training.

### **3.5 Public Participation**

Communication is a strategy that is needed for successful implementation of all the program's goals. It is also the fourth goal of the program. Highlighting communication as a goal stresses its importance to the program, and the need to focus efforts on communication strategies to achieve the program's objectives.

The advisory committee used to assist the hazardous waste program in its strategic planning process has been the main focus of public participation efforts. Meetings include presentations and discussions about the program's PPA process, how it represented a new way of working with EPA, and how the committee's strategic planning activities would be reflected in the PPA. An interested parties list of approximately 200 also routinely receives information about the committee's planning efforts.

The committee agreed with the principle that greater programmatic and regulatory flexibility between DEQ and EPA would help address state specific needs both from an Agency and regulated community standpoint. However, concern was expressed over the potential for EPA to override DEQ actions, if the implementation of this new flexible approach does not meet EPA's expectations. This concern underlies the importance for DEQ and EPA to cooperatively work together in the strategic planning effort so that flexibility initiatives developed during the planning process can be reflected in next year's PPA.

The input of the advisory committee, along with work from the internal planning group, has been a major contributor to the strategies and activities presented in this agreement workplan.

On May 20, 1997, a regular meeting of the advisory committee was used to present an update on the hazardous waste PPA and information on the PPAs being developed by DEQ's air and water quality programs. Both the Air and Water programs invited other participants who had specific interests in these PPAs. This meeting was also designated as the kick-off for the public participation process for the next round of PPAs. The short time frame for completing the 97-98 PPAs has provided little opportunity for soliciting and considering public comment. However, the Department is committed to implementing thorough public participation in the next PPA cycle.

### **3.6 Interagency Communication**

Communication between DEQ's hazardous waste program and EPA Region 10 will be critical to ensure successful implementation of the agreement. Communication tools, such as regular conference calls and periodic meetings, will be used to update both parties in agreement progress, as well as to resolve issues identified during the courses of the year.

## HAZARDOUS WASTE PROGRAM PARTNERSHIP PLAN

| GOAL 1 MINIMIZATION AND PREVENTION - TO REDUCE THE USE OF TOXICS AND MINIMIZE THE GENERATION                         |   |   |                            |   |
|--|---|---|----------------------------|---|
| OBJECTIVE 1 DECREASE TOXICS USE  |   |   |                            |   |
| STRATEGY   | ACTIVITY AREA                                 | ACTIVITY  | PERCENTAGE OF RESOURCES    |   |
| CORE AUTHORIZED RCRA PROGRAM   |   |   |                            |   |
|  | Waste Minimization                            | Implement National Waste Minimization Plan.   | 1% EPA<br>0% Federal grant | State wa<br>implem<br>Assistan<br>Reducti   |
| STATE ONLY   |   |   |                            |   |
|  | Toxics Use Reduction (TUR) Law Administration | Plan notices, recordkeeping, reporting.<br>Focus effort on SQGs without plans.  | 3.5% State Program         | No. of r<br>No. of p<br>No. of p<br>No. of r<br>No. of r<br>develop                                     |
|  | Rulemaking                                    | Rulemaking to implement the TUR changes in SB146.   | 0.2% State Program         | Rules ac  |
| Increased DEQ presence through education and outreach that builds public trust and promote a decrease in toxics use. | Education/Outreach<br>Technical Assistance    | WRAP site visits - P2 portion.<br>Training of regulated community and DEQ staff.<br>Workshops.<br>Trade association meetings.<br>Articles/Publications.<br>Fact sheets.<br><b>Option to evaluate:</b><br>Revitalize the Governor's Award. | 6% State Program           | No. of s<br>TRI rele<br>TUR re<br><b>Examp</b><br>No. of r<br>No. of r<br>"custom<br>No. of<br>preventi |

| GOAL 1 MINIMIZATION AND PREVENTION - TO REDUCE THE USE OF TOXICS AND MINIMIZE THE GENERATION                                     |  |   |                         |  |
|--|--|---|-------------------------|--|
| OBJECTIVE 1 DECREASE TOXICS USE  |  |   |                         |  |
| STRATEGY   | ACTIVITY AREA                            | ACTIVITY  | PERCENTAGE OF RESOURCES |  |
| Continuously review and improve the hazardous waste program.   | Strategic Planning/Program Development   | Through the strategic planning process, the following strategies and recommended actions are the most effective way to implement the WRAP and inspection portions of the program.   |                         |  |
| Work with EPA and other media programs to establish greater program and media communication and coordination.                    | Cross Media and Program Coordination     | <b>Options to evaluate:</b><br>Work with other agency staff to identify cross media issues.<br>Quarterly meetings between media programs.<br>Train HW staff on cross media issues.<br>Incorporate cross media issues in all WRAP and inspection activities.   |                         | <b>Example:</b><br>No. of media programs increased.<br>Training increased.   |
| Communicate consistent risk communication, and focus on toxics that present greatest threat to human health and the environment. | Prioritize, Communication                | <b>Options to evaluate:</b><br>Identify "worst first" chemicals that should be targeted for reduction.<br>Determine if reduction provides least risk.<br>Evaluate the potential state impact of the federal focus on persistent, bioaccumulative, toxic (BMT) chemicals.  |                         | <b>Example:</b><br>Identify focus on chemicals.<br>Communicate and generate.<br>By 2005, bioaccumulative hazardous waste with a ban.   |
| Provide technical assistance to small companies that promotes toxics use reduction.  | Education Outreach; Technical Assistance | <b>Options to evaluate:</b><br>Broaden focus to industries not historically reached.<br>Utilize business sector workshops.<br>Use "welcome wagon" approach. Focus on industry groups; create generic program for small companies. Involve community in education/assistance in small source reduction programs. Supply information on alternatives. |                         | <b>Example:</b><br>No. of small companies reached.<br>No. of small source reduction programs.<br>No. of small source reduction programs on less than \$1 million.<br>Decreased toxics use. |

| <b>GOAL 1            MINIMIZATION AND PREVENTION - TO REDUCE THE USE OF TOXICS AND MINIMIZE THE GENERATION</b> |  |   |                         |  |
|--|--|---|-------------------------|--|
| <b>OBJECTIVE 1    DECREASE TOXICS USE</b>  |  |   |                         |  |
| STRATEGY   | ACTIVITY AREA                          | ACTIVITY  | PERCENTAGE OF RESOURCES |  |
| Ensure that DEQ's enforcement policy creates incentives to reduces toxics.                                     | Enforcement systems<br>Penalty Systems | <b>Options to evaluate:</b><br>Require the use of alternative equipment or chemicals.<br>Provide options during inspections/enforcement to encourage toxics reduction.<br>Increase penalties for hazardous waste mismanagement. |                         | <b>Examp</b><br>Number<br>preventi<br>Number<br>incorpor |

| <b>GOAL 1            MINIMIZATION AND PREVENTION - TO REDUCE THE USE OF TOXICS AND MINIMIZE THE GENERATION</b> |                           |  |                               |   |
|--|---------------------------|--|-------------------------------|---|
| <b>OBJECTIVE 2    DECREASE WASTE GENERATION</b>  |                           |  |                               |   |
| STRATEGY   | ACTIVITY AREA             | ACTIVITY   | PERCENTAGE OF RESOURCES       |   |
| <b>CORE AUTHORIZED RCRA PROGRAM</b>  |                           |  |                               |   |
|  | Waste Minimization        | Implement National Waste Minimization Plan.                                    | 2.0% EPA<br>0 % Federal grant | State wa<br>implem<br>program                                       |
| <b>STATE ONLY</b>  |                           |  |                               |   |
|  | TUR Law<br>Administration | Plan notices, recordkeeping, reporting.<br>Focus effort on SQGs without plans. | 3.5% State Program            | No. of S<br>No. of p<br>No. of p<br>No. of T<br>No. of r<br>develop |

| <b>GOAL 1            MINIMIZATION AND PREVENTION - TO REDUCE THE USE OF TOXICS AND MINIMIZE THE GENERATION</b>             |  |   |                                |  |
|--|--|---|--------------------------------|--|
| <b>OBJECTIVE 2        DECREASE WASTE GENERATION</b>  |  |   |                                |  |
| <b>STRATEGY</b>  | <b>ACTIVITY AREA</b>                           | <b>ACTIVITY</b>   | <b>PERCENTAGE OF RESOURCES</b> |  |
|  | Rulemaking                                     | Rulemaking to implement the TUR changes in SB146  | 0.2% State Program             | Rules a  |
| Increased DEQ presence through education and outreach that builds public trust and promote a decrease in waste generation. | Education and Outreach<br>Technical Assistance | WRAP site visits.<br>Training of regulated community and DEQ staff.<br>Workshops.<br>Trade association meetings.<br>Articles/Publications.<br>Fact Sheets.<br><b>Option to evaluate:</b><br>Revitalize the Governor's Award.  | 6.0% State Program             | No. of s<br>HW gen<br>reportin<br><b>Examp</b><br>No. of r<br>No of re<br>"custom<br>No. of g<br>WRAP<br>By 2003<br>quantity<br>toxicity |
| Continuously review and improve the hazardous waste program.   | Strategic<br>Planning/Program<br>Development   | Through the strategic planning process the following strategies and recommended ac<br>the most effective way to implement the WRAP and inspection portions of the progr   |                                |  |
| Work with EPA and other media programs to establish greater program and media communication.                               | Cross Media and<br>Program Coordination        | <b>Options to evaluate:</b><br>Work with other agency staff to identify cross media issues.<br>Organize quarterly meetings between media programs/agencies.<br>Train HW staff on cross media issues.<br>Incorporate cross media issues in all WRAP and inspection activities. |                                | <b>Examp</b><br>No. of n<br>program<br>Increase<br>Training  |

| <b>GOAL 1            MINIMIZATION AND PREVENTION - TO REDUCE THE USE OF TOXICS AND MINIMIZE THE GENERATION</b>   |  |  |                                |  |
|--|--|--|--------------------------------|--|
| <b>OBJECTIVE 2        DECREASE WASTE GENERATION</b>  |  |  |                                |  |
| <b>STRATEGY</b>  | <b>ACTIVITY AREA</b>                     | <b>ACTIVITY</b>  | <b>PERCENTAGE OF RESOURCES</b> |  |
| Communicate consistent risk communication, and balance risk of waste minimization against good waste management. | Prioritize, Communication                | <b>Options to evaluate:</b><br>Identify “worst first” wastes for reduction.<br>Determine if reduction provides least risk.<br>Assess reduction impacts on other media.   |                                | <b>Examp</b><br>Identify<br>focus re<br>Commu<br>and gen<br>Reducti                            |
| Provide technical assistance to small companies that promotes waste reduction.                                   | Education/Outreach, Technical Assistance | <b>Options to evaluate:</b><br>Broaden base of regulated industry.<br>Utilize business sector workshops.<br>Use “welcome wagon” approach.<br>Focus on industry groups; create generic program for small companies.<br>Involve community in education/assistance in small source reduction programs.<br>Supply information on alternatives. |                                | <b>Examp</b><br>No. of r<br>compan<br>No. of s<br>No. of s<br>on less s<br>Reducti<br>small bu |
| Ensure that DEQ’s enforcement policy creates incentives to reduce waste.   | Compliance and Enforcement Systems       | <b>Options to evaluate:</b><br>Require the use of alternative equipment or chemicals.<br>Provide options during inspections/enforcement to encourage waste reduction.  |                                | <b>Examp</b><br>Reducti<br>Number<br>prevent<br>Number<br>pollutio                             |
| Provide monetary incentives to reduce waste.   | Incentives                               | <b>Options to evaluate:</b><br>Increase costs of disposal to reflect environmental and social costs.<br>Eliminate cap on generator fees.<br>Eliminate all CEG waste going to solid waste landfills.  |                                | <b>Examp</b><br>Reducti<br>Reducti<br>Increase<br>events o                                     |

| <b>GOAL 1            MINIMIZATION AND PREVENTION - TO REDUCE THE USE OF TOXICS AND MINIMIZE THE GENERATION</b> |                        |  |                         |   |
|--|------------------------|--|-------------------------|---|
| <b>OBJECTIVE 2        DECREASE WASTE GENERATION</b>  |                        |  |                         |   |
| STRATEGY   | ACTIVITY AREA          | ACTIVITY   | PERCENTAGE OF RESOURCES |   |
| Create processes or mechanisms to increase DEQ's and EPA's flexibility in considering waste minimization.      | Regulatory Flexibility | <b>Options to evaluate:</b><br>Review rules, policies, interpretations for barriers to waste minimization and recycling. |                         | <b>Examp</b><br>Increase<br>New po<br>minimiz |

| <b>GOAL 2            SAFE MANAGEMENT- TO MINIMIZE EXPOSURES AND RELEASES THROUGH THE APPROPRIATE MANAG AND HAZARDOUS WASTE</b> |                            |  |   |   |
|--|----------------------------|--|---|---|
| <b>OBJECTIVE 1        INCREASE COMPLIANCE WITH RCRA</b>  |                            |  |   |   |
| STRATEGY   | ACTIVITY AREA              | ACTIVITY   | PERCENTAGE OF RESOURCES                           |   |
| <b>CORE AUTHORIZED RCRA PROGRAM</b>  |                            |  |   |   |
| Address federal priority sectors.<br>Address state priorities.   | Compliance/<br>Enforcement | Inspections.<br>Complaint Response.<br>Follow up enforcement actions<br><b>Options to evaluate:</b><br>Increased inspections.<br>Short form inspections. | 11% EPA<br>45% Federal Grant<br>37% State Program | 17 LQC<br>34 SQC<br>38 Com<br>TSD ins<br><i>Above i</i><br><i>commit</i><br><i>be cond</i><br>No. of f<br>No. of i<br>No. and<br>No. of r<br><b>Examp</b><br>By 2003<br>accordi<br>the envi |

| GOAL 2 SAFE MANAGEMENT- TO MINIMIZE EXPOSURES AND RELEASES THROUGH THE APPROPRIATE MANAGEMENT OF SOLID AND HAZARDOUS WASTE |                        |   |  |  |
|--|------------------------|---|--|--|
| OBJECTIVE 1 INCREASE COMPLIANCE WITH RCRA  |                        |   |  |  |
| STRATEGY   | ACTIVITY AREA          | ACTIVITY  | PERCENTAGE OF RESOURCES                          |  |
| Continue permitting activity at permit track TSDs.   | Permitting             | Continue permitting activity at remaining TSDs, including: one permit renewal, Part B permit development, permit modifications. | 1% EPA<br>20% Federal Grant<br>12% State Program | RCRIS<br>Permit r<br>Permit r<br><b>Examp</b><br>By 2003<br>manage<br>baseline<br>in place<br>soil and |
|  | Program Administration | Coordination with EPA.<br>Annual reporting and invoicing cycle.<br>Database management.   | 3% EPA<br>6% Federal Grant<br>3% State Program   | Timely<br>invoicing<br>RCRIS<br>Biannual<br>Permit p   |
|  | Rulemaking             | Fee structure rule.<br>SB 420 rules.<br>Adoption of federal rules through July 1997 and July 1998.                              | 2% Federal Grant<br>4% State Program             | Fee stru<br>Federal<br>1997.<br>SB420  |
|  | Authorization          | Authorization packages for adoption of federal rules by reference, including universal waste rule.                              | 3% EPA<br>2% Federal Grant<br>2% State Program   | DEQ au<br>Federal<br>through   |

| GOAL 2 SAFE MANAGEMENT- TO MINIMIZE EXPOSURES AND RELEASES THROUGH THE APPROPRIATE MANAGEMENT AND HAZARDOUS WASTE   |  |   |  |  |
|---|--|---|--|--|
| OBJECTIVE 1 INCREASE COMPLIANCE WITH RCRA   |  |   |  |  |
| STRATEGY  | ACTIVITY AREA                            | ACTIVITY  | PERCENTAGE OF RESOURCES                        |  |
| STATE ONLY  |  |   |  |  |
| Increase DEQ presence through education and outreach that builds public trust and increases RCRA compliance.  | Education/Outreach                       | WRAP Site visits - compliance portion.<br>Training of regulated community and DEQ staff.<br>Workshops.<br>Trade association meetings.<br>Articles/Publications.   | 0% EPA<br>0% Federal Grant<br>6% State Program | <b>Example:</b><br>No. of s<br>No. of r<br>No of re<br>“custom<br>No. of s<br>No. of t<br>achieve            |
| Continuously review and improve the hazardous waste program.  | Strategic Planning/Program Improvement   | Continue strategic planning and program evaluation effort to address the following:   |  |  |
| Provide guidance on the regulations that is easy to understand and teach, and have a technical assistance program that the regulated community trusts and uses. | Education/Outreach; Technical Assistance | <b>Options to evaluate:</b><br>Broaden base of industries provided technical assistance.<br>Utilize business sector workshops.<br>Use “welcome wagon” approach.<br>Focus on industry groups; create generic program for small companies.<br>Involve community in education/assistance in small source compliance.<br>Share success stories.<br>Publicize WRAP program.<br>Partner big business in communication with smaller business on training and other issues. |  | <b>Example:</b><br>No. of r<br>from sm<br>No. of s<br>program<br>Training<br>Reducti<br>No. of g<br>technica |

| <b>GOAL 2            SAFE MANAGEMENT- TO MINIMIZE EXPOSURES AND RELEASES THROUGH THE APPROPRIATE MANAGEMENT OF SOLID AND HAZARDOUS WASTE</b> |   |   |                         |   |
|--|---|---|-------------------------|---|
| <b>OBJECTIVE 1        INCREASE COMPLIANCE WITH RCRA</b>  |   |   |                         |   |
| STRATEGY   | ACTIVITY AREA   | ACTIVITY  | PERCENTAGE OF RESOURCES |   |
| Create processes or mechanisms at DEQ to provide definitive advice on regulatory loopholes and gray areas that prevent compliance with RCRA. | Close loopholes, policy clarifications                      | <b>Options to evaluate:</b><br>Increase use of UW to control recyclables.<br>Remove CEG loophole.<br>Develop BMPs for waste management.<br>Support the safe use and disposal of recyclables.  |                         | <b>Example:</b><br>Policy and<br>clarification<br>Draft policy<br>No. of v                |
| Ensure that DEQ's enforcement policy creates incentives to comply with RCRA.   | Enforcement Systems   | <b>Options to evaluate:</b><br>Increase penalties.<br>Increase number of inspections.<br>Increase number of repeat inspections.<br>Develop a proactive program to find those in noncompliance.<br>Use short form inspection on companies with established compliance programs, spend more time on additional inspections.<br>Empower staff to select regs to enforce. |                         | <b>Example:</b><br>Reduction<br>Reduction<br>Increase<br>No. of e<br>pollution<br>complia |
| Use existing WRAP staff more efficiently.  | Prioritize; Resource Distribution; Cross Media Coordination | <b>Options to evaluate:</b><br>Refine selection process for WRAP visits.<br>Allow specialized staff to identify geographic problems.<br>Offer technical assistance after an inspection.   |                         | <b>Example:</b><br>Reduction<br>Reduction<br>Violation                                    |
| Use existing Inspector staff more efficiently.   | Prioritize; Resource Distribution; Cross Media Coordination | <b>Options to evaluate:</b><br>Refine selection process for inspections.<br>Allow specialized staff to identify geographic problems.<br>Work with other agencies/program to identify unsafe practices.<br>Use complaints as a way to target.<br>Use short form inspections.<br>Conduct "focused" inspections.   |                         | <b>Example:</b><br>Reduction<br>Reduction<br>No. of v<br>No. of f                         |

| GOAL 2 SAFE MANAGEMENT- TO MINIMIZE EXPOSURES AND RELEASES THROUGH THE APPROPRIATE MANAGEMENT OF CHEMICALS AND HAZARDOUS WASTE |  |   |                         |   |
|--|--|---|-------------------------|---|
| OBJECTIVE 2 INCREASE SAFE MANAGEMENT BEYOND RCRA COMPLIANCE  |  |   |                         |   |
| STRATEGY   | ACTIVITY AREA                          | ACTIVITY  | PERCENTAGE OF RESOURCES |   |
| STATE ONLY   |  |   |                         |   |
|  | Rulemaking                             | Review of federal rules for any state only needs (see Goal 2, Objective 1).   |                         | Adoption involve other pr   |
| Increase DEQ presence through education and outreach that builds public trust and promotes safe management beyond RCRA         | Education/Outreach                     | WRAP Site visits.<br>Training of regulated community and HW staff on other state and local program requirements.<br>Workshops.<br>Trade association meetings.<br>Articles/Publications.   | 6 % State               | <b>Examp</b><br>No. of s<br>No. of r<br>No of re<br>“custom<br>No. of r<br>No. of r<br>agency<br>No. of s<br>No. of t |
| Continuously review and improve the hazardous waste program.   | Strategic Planning/Program Development | Continue strategic planning and program evaluation effort to address the following:   |                         |   |
| Increase DEQ presence through education and outreach that builds public trust and promotes safe management beyond RCRA.        | Education/Outreach                     | <b>Options to evaluate:</b><br>Participate in Agency wide flexibility initiatives, e.g., green permits.<br>Work with other agency staff to identify cross media issues.<br>Quarterly meetings between media programs and other agencies.<br>Incorporate cross media issues in all WRAP and inspection activities. |                         | <b>Examp</b><br>No. of s<br>No. of r<br>No. of r<br>“custom<br>No. of r<br>No. of r<br>agency<br>No. of s<br>No. of t |

| GOAL 2 SAFE MANAGEMENT- TO MINIMIZE EXPOSURES AND RELEASES THROUGH THE APPROPRIATE MANAGEMENT OF HAZARDOUS CHEMICALS AND HAZARDOUS WASTE                        |   |  |                         |  |
|---|---|--|-------------------------|--|
| OBJECTIVE 2 INCREASE SAFE MANAGEMENT BEYOND RCRA COMPLIANCE   |   |  |                         |  |
| STRATEGY  | ACTIVITY AREA   | ACTIVITY   | PERCENTAGE OF RESOURCES |  |
| Increase DEQ presence through education and outreach that builds public trust and promotes safe management beyond RCRA.   | Education/Outreach  | <b>Options to evaluate:</b><br>Participate in Agency wide flexibility initiatives, e.g., green permits.<br>Work with other agency staff to identify cross media issues.<br>Quarterly meetings between media programs and other agencies.<br>Incorporate cross media issues in all WRAP and inspection activities.  |                         | <b>Example:</b><br>No. of s<br>No. of r<br>No. of r<br>“custom<br>No. of r<br>No. of r<br>agency<br>No. of s<br>No. of t |
| Provide guidance on the regulations that is easy to understand and teach, and have a technical assistance program that the regulated community trusts and uses. | Education/Outreach;<br>Technical Assistance                       | <b>Options to evaluate:</b><br>Train HW staff on other applicable media/agency requirements.<br>Broaden base of regulated industry.<br>Utilize business sector workshops.<br>Use “welcome wagon” approach.<br>Focus on industry groups; create generic program for small companies.<br>Involve community in education/assistance in small source compliance.<br>Publicize success stories.<br>Publicize WRAP program.<br>Partner big business in communication with smaller business on training and other issues. |                         | <b>Example:</b><br>No. of r<br>from sm<br>No. of s<br>program<br>Training<br>No. of r<br>provide                         |
| Use existing WRAP staff more efficiently to promote safe management beyond RCRA   | Prioritize; Resource<br>Distribution; Cross<br>Media Coordination | <b>Options to evaluate:</b><br>Refine selection process for WRAP visits.<br>Allow specialized staff to identify geographic problems.<br>Offer TA after an inspection.<br>Use complaints as a way to target.<br>Use multi-media checklist.  |                         | <b>Example:</b><br>Reducti<br>Reducti<br>Increase<br>No. of t  |

| GOAL 2 SAFE MANAGEMENT- TO MINIMIZE EXPOSURES AND RELEASES THROUGH THE APPROPRIATE MANAGEMENT OF CHEMICALS AND HAZARDOUS WASTE                 |  |   |                         |   |
|--|--|---|-------------------------|---|
| OBJECTIVE 2 INCREASE SAFE MANAGEMENT BEYOND RCRA COMPLIANCE  |  |   |                         |   |
| STRATEGY   | ACTIVITY AREA  | ACTIVITY  | PERCENTAGE OF RESOURCES |   |
| Use existing Inspector staff more efficiently to promote safe management beyond RCRA.  | Prioritize; Resource Distribution; Cross Media and Program Coordination      | <b>Options to evaluate:</b><br>Refine selection process for inspections.<br>Allow specialized staff to identify geographic problems<br>Work with other agencies/program to identify unsafe practices.<br>Use complaints as a way to target.<br>Use multi-media checklist.   |                         | <b>Example:</b><br>Reducing<br>Reducing<br>Increasing   |
| Identify rules that allow mismanagement of recyclables and hazardous waste, create mechanisms to obtain safe management practices beyond RCRA. | Policy Clarifications; Close Loopholes; Cross Media and Program Coordination | <b>Options to evaluate:</b><br>Increase use of universal waste rule to control recyclables.<br>Develop BMPs for recyclable management.<br>Develop policies that fix loopholes allowing the mismanagement of HW.<br>Make sure all regulations encourage good management.<br>DEQ promotes disposal options for CEG/UW waste.<br>Close POTW, WWTU, CEG loopholes.<br>Support the safe use and disposal of recyclables. |                         | <b>Example:</b><br>Reducing<br>Rules and<br>mismanag<br>Rules and<br>manage<br>No. of t<br>provide<br>No. of t<br>provide |
| Through cross media and agency coordination and communication, ensure that all regulations encourage safe management beyond RCRA.              | Cross Media and Program Coordination; Communication                          | <b>Options to evaluate:</b><br>Review all DEQ and other agency rules that affect HW management for consistency.<br>HW staff review and comment on other program/agency rulemaking.<br>Defer authority to agency with the highest ability to manage and control risk.<br>Work cooperatively with other programs for success measurements.<br>Work with other agencies/programs to identify conflicts in rules.       |                         | <b>Example:</b><br>HW inte<br>HW rev<br>rulemak<br>Develop<br>regardin<br>Develop<br>interpre<br>regulati                 |

| GOAL 3                      REMEDIATION - TO REMEDIATE NON-AUTHORIZED RELEASES OF TOXIC CHEMICALS AND HAZARDOUS ENVIRONMENT |  |  |   |   |
|---|--|--|---|---|
| STRATEGY  | ACTIVITY AREA  | ACTIVITY   | PERCENTAGE OF RESOURCES                       |   |
| CORE AUTHORIZED RCRA PROGRAM  |  |  |   |   |
| Work with DEQ's Cleanup Program and EPA Region 10 to transition RCRA corrective action sites and HW generators cleanups.    | Corrective Action/Cleanup                                      | Coordinate implementation of transition strategy agreement with EPA.<br>Transition certain corrective action activities to DEQ's cleanup program as set forth in the strategy.<br>Develop communication plan with EPA.<br>Develop date plan.<br>Maintain core RCRIS CA data.<br>Input RCRIS data from Cleanup Program.<br>Provide public notice on the corrective action strategy. | 19.0% EPA<br>4.0% Federal Grant<br>3.5% State | Complete plan and Success EPA. No. of R transfer Commu cleanup sites. Quarter 10 and            |
| Continue corrective action activity   | Corrective action  | Continue corrective action at subject facilities.  | 33% EPA<br>10% Federal Grant<br>2% State      | Input R Complete <b>Examp</b> By 2003 cleanup human l By 2003 have hu high pri releases develop |
| STATE ONLY  |  |  |   |   |
| Refer spills and releases at HW generator sites to cleanup program.   | Cross-Program coordination, communication, education, outreach | <b>Options to evaluate:</b><br>Develop referral coordination with cleanup program.<br>Refer HW generator cleanups to Cleanup program.<br>Provide technical assistance on how generators can use the cleanup program.   |   | <b>Examp</b><br>No. of R program  |

| GOAL 4 COMMUNICATION - TO MAXIMIZE THE PUBLIC'S INVOLVEMENT IN THE ACHIEVEMENT OF THE GOAL MANAGEMENT AND REMEDIATION |                        |   |  |   |
|---|------------------------|---|--|---|
| STRATEGY  | ACTIVITY AREA          | ACTIVITY  | PERCENTAGE OF RESOURCES  |   |
| CORE AUTHORIZED RCRA PROGRAM  |                        |   |  |   |
|   | Training               | EPA Subpart CC training for DEQ staff, August 1997.<br>If resources allow, basic and update training for regulated community.               | 5.0% EPA<br>0.5% Federal Grant<br>0.5% State Program                 | <b>Examp</b><br>Training<br>% of im         |
|   | Authorization          | 3 packages:<br>Minor federal changes.<br>Universal waste.<br>New federal regulations up to July 1, 1997.                                    | x% EPA ( included elsewhere)<br>1% Federal Grant<br>1% State Program | DEQ re                                      |
|   | Corrective Action      | Public notice re: transition strategy.  | % EPA (included elsewhere)<br>2% Federal Grant<br>1% State Program   | <b>Examp</b><br>Public i                    |
|   | Information Management | Collect Data.<br>Entry of core RCRIS data.<br>Monthly update of RCRIS.<br>Submit Biennial Report.   | 8% EPA<br>4% Federal Grant<br>2% State Program                       | <b>Examp</b><br>1997 Bi<br>Input co         |
|   | Program Management     | Collect data and perform QA/QC on notifications and Part A's.<br>Assign DEQ numbers.<br>Revise MOU.<br>RCRA coordination meetings with EPA. | 14% EPA<br>4% Federal Grant<br>2% State Program                      | <b>Examp</b><br>No. of I<br>RCRA o<br>RCRIS |

| GOAL 4 COMMUNICATION - TO MAXIMIZE THE PUBLIC'S INVOLVEMENT IN THE ACHIEVEMENT OF THE GOAL MANAGEMENT AND REMEDIATION |  |   |                         |  |
|---|--|---|-------------------------|--|
| STRATEGY  | ACTIVITY AREA                          | ACTIVITY  | PERCENTAGE OF RESOURCES |  |
| STATE ONLY - These activities are already mentioned in Goals 1-3, but are highlighted here for greater emphasis       |  |   |                         |  |
| Continuously review and improve the hazardous waste program.  | Strategic Planning/Program Development | Continue hazardous waste program strategic planning effort.<br>Participation in agency-wide effort to find a stable funding source for the hazardous waste and other DEQ programs.<br>Regular hazardous waste management meetings, hazardous waste staff quarterly meetings, unit staff meetings.   |                         | Complete<br><b>Example:</b><br>Obtain :<br>Meeting   |
| Increase DEQ presence through education, outreach that builds public trust.   | Education/Outreach                     | WRAP Site visits .<br>Workshops.<br>Trade association meetings.<br>Articles/Publications.<br>Work with other agency staff to identify cross media issues.<br>Training of regulated community and HW staff on program requirements.<br><b>Options to evaluate:</b><br>Increased inspections.<br>Short form inspections.<br>Quarterly meetings between media programs and other agencies.<br>Incorporate cross media issues in all WRAP and inspection activities.<br>Provide training for legislators.<br>Share success stories. |                         | <b>Example:</b><br>Increase<br>commu<br>Increase<br>No. of t<br>No. of v<br>Attenda<br>program |

| GOAL 4 COMMUNICATION - TO MAXIMIZE THE PUBLIC'S INVOLVEMENT IN THE ACHIEVEMENT OF THE GOAL<br>MANAGEMENT AND REMEDIATION                       |                            |   |                            |   |
|--|----------------------------|---|----------------------------|---|
| STRATEGY   | ACTIVITY AREA              | ACTIVITY  | PERCENTAGE<br>OF RESOURCES |   |
| DEQ should communicate program priorities clearly with a strong consistent message. Improve public understanding of environmental information. | Communication;<br>Outreach | <b>Options to evaluate:</b><br>Focus on community groups, environmental group for educational outreach.<br>Improve public access to information, and details of the information.<br>Get the public involved in targeting sites for inspections and technical assistance.<br>Use more press releases, more information in local newspapers.<br>Provide accurate information about the health impacts of toxics.<br>Improve use of Internet to provide information<br>Communicate inspection goals. |                            | <b>Examp</b><br>Increase<br>No. of r<br>No. of r<br>environ<br>Distribu |